

1 JOSEPH T. McNALLY
2 Acting United States Attorney
3 LINDSEY GREER DOTSON
4 Assistant United States Attorney
5 Chief, Criminal Division
6 J. MARK CHILDS (Cal. Bar No. 162684)
7 Assistant United States Attorney
8 1400 United States Courthouse
9 312 North Spring Street
10 Los Angeles, California 90012
11 Telephone: (213) 894-2433
12 E-mail: mark.childs@usdoj.gov

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT

16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,

18 No. CR 23-258-DMG

19 Plaintiff,

20 MOTION TO DISMISS INDICTMENT
21 PURSUANT TO FEDERAL RULE OF
22 CRIMINAL PROCEDURE 48(a)

23 v.

24 SAI ZHANG, et al.,

25 Defendants.

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17 On May 25, 2023, defendants SAI ZHANG, PANYU ZHAO, PEIJI TONG,
18 CHENGWU HE, HANG SU, XUANYI MU, JIAYONG YU, SHUO YANG, XIAOLEI YE,
19 and JIAXUAN HE (collectively, "Defendants") were indicted in the
20 above captioned case. The indictment was filed at Docket Entry No.
21 12 ("Indictment"). The Indictment contained two counts and two
22 forfeiture allegations. Subsequently, the Defendants were indicted
23 for the same and/or similar charges, among others, in another federal
24 indictment filed under another case number, pending before this
25 Court.

26 The Acting United States Attorney, having been advised that
27 Defendants has not voiced an objection, moves for a dismissal without
28 prejudice of said Indictment as to all Defendants, pursuant to Rule

1 48(a) of the Federal Rules of Criminal Procedure, in the interests of
2 justice.

3 Dated: March 21, 2025

Respectfully submitted,

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/s/

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J. MARK CHILDS
Assistant United States Attorneys

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

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